

SEPTEMBER 2025

CODE OF CONDUCT

MOLINO PASINI S.P.A.
SOCIETÀ BENEFIT

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Introduction

For over a century, Molino Pasini S.P.A. Società Benefit Corporation has been operating in the province of Mantua, Italy, specialising in the production of high-quality soft wheat flour. Established and managed by four generations, the company produces flours for various industries, including bakery, fresh pasta, pastry, and pizza. Flour quality is preserved by using carefully selected grains and a state-of-the-art internal laboratory for raw material analysis.

The company serves professional artisans, wholesalers, retailers, and manufacturing units in the food industry, as well as the final consumer. Molino Pasini S.P.A. Società Benefit is recognised for its exceptional performance in the food sector and its dedication to innovation while honouring the traditions and knowledge gained over more than a century of activity. As of September 2024, the company has adopted the legal status of a Benefit Corporation in its bylaws, formalising its commitment to achieving not only financial targets but also specific benefit objectives for the well-being of its workers and all other stakeholders, including the community it belongs to and the environment, which are essential for corporate success.

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Preamble

Molino Pasini S.P.A. Società Benefit recognises that ethics are essential in providing quality products and services to its clients. It has established this Code of Conduct as a crucial tool for safeguarding and fostering trust among all the company's stakeholders.

The Code of Conduct is intended to guide the company's operations ethically, and its provisions are therefore obligatory for the actions of all directors, leaders, staff, advisors, and anyone who, for any reason, enters into a partnership.

The rules in the Code of Conduct are based on honesty, legality, transparency, and respect, along with professional rigour in conduct and work practices, both within internal relationships and with external entities.

Entities engaging with Molino Pasini S.P.A. Società Benefit must follow behavioural standards, which are essential in both internal and external relationships. Behaviour that conflicts with the principles of the Code of Conduct cannot be justified, even if it benefits the Company, as it can cause serious harm to the trust relationship with the organisation.

The Code of Conduct applies to Members, Directors, the Board of Auditors, the entity responsible for legal auditing, employees at all levels, assimilated collaborators, as well as third parties (suppliers, business and financial partners, consultants, contractors, workers, collaborators) and anyone who establishes, directly or indirectly, permanently or temporarily, a contractual relationship with Molino Pasini S.P.A. Società Benefit.

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To fully meet the objectives of the Code, the Company will regularly update its content to reflect changes in legislation and the lessons learned from its application, which are mandatory contributions for all.

The Code of Conduct is widely shared internally by being displayed in accessible locations and distributed to stakeholders, is available to any interlocutor, and is published on the company's website www.molinopasini.com.

Violating this Code of Conduct damages trust and may lead to disciplinary measures and reparations, as outlined in Article [number]. 7 of L. 300/70 (Workers' Statute) and the collective bargaining agreement. The Company will oversee compliance with the Code, establishing suitable tools for information, prevention, and monitoring, to ensure transparency in actions and conduct, and, if necessary, apply sanctions. Communications, including reports of suspected breaches of the Code of Conduct, requests for clarifications or opinions, etc., may be sent to: legale@pec.molinopasini.it.

In accordance with Directive (EU) 2019/1937, Molino Pasini has established a whistleblowing procedure to protect individuals who report breaches of Union law, national legislation, or internal regulations. This procedure provides secure and anonymous reporting channels, explicitly prohibits retaliation or discrimination, whether direct or indirect, and outlines sanctions for those who breach the protective measures for whistleblowers or who intentionally or through gross negligence submit false reports. The procedure is available for public review on the corporate website.

Values and Principles

Molino Pasini S.P.A. Società Benefit is founded on a fundamental respect for the following values and principles, which are relevant to all stakeholders across various roles and responsibilities.

INTEGRITY AND LEGALITY

All recipients of this Code of Conduct must act honestly and ethically, acknowledging the importance of following laws and regulations in Italy and other foreign locations where they work. They are also required to adhere to the Company's internal policies, including the Code of Conduct and any related agreements, contracts, conventions, and similar arrangements with third parties.

TRANSPARENCY

The Company, along with all its members, is committed to ensuring that information about business goals and strategic decisions is accessible and transparent. It encourages active involvement and participation, nurtures a company culture grounded in trust and openness, and guarantees that business processes are straightforward and comprehensible across all levels of the organisation.

FAIRNESS AND ETHICAL INTEGRITY

The principles of fairness and integrity are based on the accuracy, reliability, consistency, and thoroughness of information, requiring respect for the rights of all parties involved in work activities. Respect, trust, and communication are the core principles the company adheres to to create enthusiasm and team cohesion.

EQUITY

All recipients of this Code of Conduct are expected to demonstrate behaviour that embodies principles of objectivity and impartiality, avoiding all forms of favouritism or discrimination.

PROFESSIONALISM AND SECURITY

The current Code of Conduct urges every recipient to consistently strive, through their actions, to uphold the company's goal of delivering products that meet the highest standards of safety, health, and quality.

PROTECTION OF DIVERSITY

Molino Pasini S.P.A. Società Benefit is dedicated to managing personal data and collected information in accordance with current privacy laws.

CONFIDENTIALITY

Recipients of this Code of Conduct must not disclose any knowledge, confidential data, industrial secrets, commercial details, or other non-public information about the Company to third parties, unless legally required or explicitly specified in contractual agreements.

PROTECTION OF THE HEALTH AND SAFETY OF WORKERS

Molino Pasini S.P.A. Società Benefit recognises that individuals are essential for progress; therefore, their health and safety at work are safeguarded, and professional development is encouraged to broaden the range of skills available.

PROTECTION OF THE HEALTH AND SAFETY OF WORKERS

Molino Pasini S.P.A. Società Benefit, along with its staff, is committed to implementing a series of practices and protocols to ensure that the packaged product is safe for human consumption. This includes the selection of suppliers, analysis of raw materials, empowering operators involved in various stages of processing, ensuring traceability, providing training, and providing accurate information to consumers.

ENVIRONMENTAL PROTECTION

Molino Pasini S.P.A. Società Benefit recognises the impact of its activities on the ecosystem. It is dedicated to safeguarding the local environment, promoting sustainable development in the community, and raising awareness among all stakeholders involved in the value chain.

INTERDEPENDENCE

Molino Pasini S.P.A. Società Benefit recognises that companies are not isolated entities but are part of a broader system that includes other businesses and the environment. Therefore, the Company and all its internal stakeholders are committed to collaborating to share expertise and resources for the common good, taking into account the social and environmental impact of their activities.

Respecting these principles is essential to the work relationship, fostering responsible actions towards the Company, stakeholders, and all interested parties. In this context, administrators and executives are expected to demonstrate proper conduct to those within the company, assuming organisational responsibilities and playing a developmental role for the enterprise.

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Behavioural Standards: Stakeholder Engagement

The governance system adopted by Molino Pasini S.P.A. Società Benefit complies with applicable laws. It is dedicated to fostering the most equitable collaboration among its components in various roles, including leadership, management, and control.

EMPLOYEES, AGENTS, AND ASSOCIATED PERSONNEL

The company values human resources, respects their autonomy, and encourages their participation in business activities. Therefore, any discrimination based on race, gender, sexual orientation, nationality, religion, language, union membership, or political views in hiring, pay, promotions, or dismissal, as well as any form of favouritism, is strictly forbidden.

All individuals interacting with the Company are expected to cooperate in fostering an environment of mutual respect and dignity. Employees, agents, and similar collaborators should never be asked to perform duties that compromise personal dignity or pose an unacceptable risk to workplace safety and health. Anyone who believes they have been discriminated against can report the incident to their direct manager or a member of the Board of Directors, who will investigate the violation of the Code of Conduct. In accordance with the regulations, a report can be filed following the whistleblowing procedure established by the Company.

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The Company is dedicated to enhancing the skills and expertise of its employees, agents, and similar collaborators, ensuring that each individual's energy and creativity are fully utilised to realise their potential. Ultimately, the Company views professional training as a vital tool for enhancing the skills of employees and their colleagues.

Molino Pasini S.P.A. Società Benefit commits to ensuring its personnel recruitment and selection processes comply with legal obligations and are based on assessing candidates' complete alignment with the required professional profiles, promoting equal opportunities for all stakeholders. Personnel are employed under standard employment agreements, and any employment relationship that attempts to bypass or conflict with existing regulations is not permitted.

The employees of the Company commit to following the obligations outlined in this Code of Conduct and to demonstrating respect for the law in the professional fulfilment of their duties. Additionally, the company's personnel carry out their responsibilities in line with principles of integrity, accuracy, loyalty, and good faith. The professionalism of employees, agents, and similar staff in performing their duties is not just a commitment to proper compliance but also a fundamental value that the Company promotes and safeguards. Consequently, illegal actions by employees and all individuals covered by the Code of Conduct are strictly prohibited, as such behaviours also compromise the integrity of professionalism. Requesting services, personal favours, or any actions that breach this Code of Conduct, as a hierarchical superior, is deemed an abuse of authority.

DIRECTORS AND COMPONENTS OF GOVERNANCE BODIES

Members of the Board of Directors and other corporate bodies (hereafter also collectively referred to as "Directors") are expected to adhere to applicable laws and the principles outlined in the Code of Conduct. Notably, the Directors agree to operate fully in accordance with the hierarchical structure of roles and the allocation of functions and responsibilities. They must fulfil their duties in line with the principles of honesty and integrity, avoiding involvement in conflicts of interest.

They are also expected to behave according to principles of autonomy, independence, and adherence to issued guidelines, and to act in such a capacity while complying with the Laws and strictly in the Company's interest.

They are also expected to behave according to principles of autonomy, independence, and adherence to issued guidelines, and to act in such a capacity while complying with the Laws and strictly in the Company's interest.

The Directors commit to maintaining the confidentiality of information obtained through their official functions at all times, and to performing their duties with an informed approach as required by Law and the Statute, exercising the diligence expected given the nature of their role and their specific expertise, particularly in relation to the dual mandate undertaken by the Company upon becoming a Società Benefit. All communication activities must be conducted in accordance with existing laws and ethical standards to protect sensitive information and industrial secrets.

Directors are strictly forbidden from exploiting their position to gain personal benefits, whether directly or indirectly, or on behalf of third parties (such as bodies, institutions, etc.). Directors remain obliged to the duties of loyalty and confidentiality even after their relationship with the company ends.

Disregarding the subjects as mentioned above, the Directors shall not be liable for any subsequent consequences or deficiencies.

CUSTOMERS

Molino Pasini S.P.A. Società Benefit considers protecting clients a core value in fulfilling the company's mission. The relationships with our clients are characterised by knowledge, professionalism, transparency, accuracy, and impartiality, guided by readiness, respect, and courtesy, in honouring contractual commitments and striving to meet expectations fully.

Molino Pasini S.P.A. Società Benefit commits to ensuring that contracts and communications with clients comply with current regulations, and to promptly conveying any information about potential contractual modifications or changes through the most appropriate channels and methods.

Client interaction is enhanced through the efficient management and prompt resolution of each type of request and any complaints, employing varied methods of action and communication that suit the nature of the need and the stakeholder. It aims to minimise the use of litigation to gain unfair advantages, resorting to it only if the other party fails to meet legitimate expectations adequately.

Molino Pasini S.P.A. Società Benefit respects its customers' privacy in accordance with applicable regulations, vowing not to disclose or distribute any personal, financial, or consumer information unless required by law.

VENDORS, COMMERCIAL PARTNERS, FINANCE AFFILIATES, AND OUTSIDE CONSULTANTS

The fulfilment of contractual obligations by suppliers and other third parties (hereinafter referred to as suppliers and partners) must adhere to the principles of fairness, integrity, diligence, and good faith, and must comply with current regulations.

The vendor and partner selection processes must adhere to relevant laws and internal policies to ensure maximum transparency in procuring works, raw materials, other goods, collaborations, and services. Therefore, the process for selecting, assigning work, and procuring goods and services of any kind should rely on objective assessments of competitiveness, quality, utility, social and environmental impact, and cost. This must adhere to principles such as free competition, equal treatment, non-discrimination, transparency, and proportionality.

Dealing with suppliers and partners, including financial and consultancy agreements, is governed by the standards outlined in this Code and is carefully and consistently monitored, particularly in relation to the quality of services or goods supplied in accordance with established benchmarks and the agreed-upon payments.

Vendors and other external parties involved with or representing the Company in any capacity must be familiar with the Ethical Code, which can be accessed on the website at www.molinopasini.com. Entering into a formal contract, each of these individuals commits to building collaborative relationships based on mutual trust by communicating and providing accurate, timely information about payment terms and schedules, while respecting applicable regulations and the legitimate expectations of the counterpart. This includes the negotiations conducted and the content of the contract entered into.

Finally, Molino Pasini S.P.A. Società Benefit commits to promoting, through its procurement activities, respect for conditions that protect workers' health and safety, the well-being of workers within the supply chain, and environmental protection.

PUBLIC INSTITUTIONS

Relations with public bodies and institutions are strictly limited to those functions explicitly designated for this purpose and to individuals who have received explicit authorisation in this matter from the Board of Directors.

Reports should emphasise maximum transparency, clarity, and accuracy. They should be presented in a way that prevents partial, misrepresented, ambiguous, or misleading interpretations by public entities with whom various relationships are held.

It is permitted to offer gifts, acts of hospitality, and courtesies to public officials or public service appointees, provided they are of nominal value and not perceived as attempts to obtain illegal or excessive favours.

Employees, collaborators, and external consultants must never be pressured to withhold or provide false information to the judiciary under any circumstances. Anyone experiencing such pressure should immediately inform their direct manager, a member of the Board of Directors, or use the company's established whistleblowing procedure.

In relation to interactions with public officials or persons associated with them, it is deemed necessary:

- Avoid circumstances that could lead to conflicts of interest.
- Establish and implement suitable reporting mechanisms when interacting with public officials or individuals associated with them.
- Ensure the accuracy and traceability of communications, information, and documents, while adhering to relevant standards of conduct in data management and transmission software.
- Ensure all declarations made by involved parties are truthful and that, when receiving contributions or funds, proper documentation is available to demonstrate their correct utilisation.

It is strictly prohibited to submit false or misleading statements to obtain public disbursements, grants, or subsidised funding, and/or to use funds received from such bodies through disbursements, grants, or funding for purposes other than those originally intended.

Moreover, it is prohibited to make or promise donations of money or other forms (such as gifts), or to offer or promise advantages of any kind.

It is considered essential to provide evidence of the key activities involved in negotiating, preparing, or executing contracts or agreements with public bodies or public service agents through negotiated procedures with public disclosure. Additionally, proof of applying for and using public funding and grants, as well as seeking permits, concessions, and other relevant authorisations, should be supplied.

Only specifically authorised individuals can intervene in judicial, tax, and/or administrative inspections (e.g., INAIL, INPS, ARPA, Labour Inspectorate, Guardia di Finanza). In these circumstances, it is necessary to preserve documentary evidence, for example, by maintaining specific reports.

POLITICAL, TRADE UNION, AND ASSOCIATION ORGANISATIONS

Molino Pasini S.P.A. Società Benefit does not make any direct or indirect donations to political parties in Italy or abroad.

No contributions are provided to organisations where a conflict of interest may arise, such as trade unions or consumer protection associations.

However, collaboration with these entities is planned only when the objective aligns with the Company's mission or pertains to public interest initiatives. In such cases, resource use must be transparent and verifiable, subject to explicit approval from the Board of Directors and recorded annually in the Impact Statement.

Each employee or collaborator must recognise that participation in political or associative activities is undertaken privately, during their own free time, at their own expense, and in accordance with applicable laws.

MEDIA AND INFORMATION SOCIETY

Relations with the media and other information sources are solely managed by the corporate roles and functions designated for this responsibility.

Employees must not disclose information about the Company to media representatives or agree to provide such information without approval from the relevant business function.

Employees who share information externally about objectives, operations, and business results—such as through speeches, conferences, seminars, articles, or publications—must first get approval from the Board of Directors for their texts, reports, and communication approaches. They should also verify that the content aligns with and is reviewed by the corporate department responsible for external communications.

COMPETITION

Molino Pasini S.P.A. Società Benefit recognises the importance of promoting fair and respectful competition among players in the same market. Therefore, the company is committed to engaging with its competitors with respect and integrity, rejecting unfair practices such as defamation or the dissemination of false information, and basing competition on sound and positive criteria, including quality, price, service, and ESG performance. It is required that all individuals acting on behalf of the company cooperate with competitors, when necessary, in compliance with current laws and regulations, and reject obtaining confidential information or data through unethical methods.

DATA PRIVACY AND INFORMATION SYSTEMS

The company's proprietary information, which is confidential and pertains to data or knowledge, should not be accessed, utilised, or shared unless by authorised individuals or those with a formal mandate.

For example, and without limitation, the following are considered confidential: information relating to chemical compositions, analyses, formulas, and studies concerning both production tools and products; projects, including commercial, management, industrial, and strategic plans; data relating to know-how and technological processes; financial operations; operational and investment strategies; operating results; employees' personal data; client and partner lists; and information regarding current and future activities, unless such information has already been duly disclosed.

The Company exclusively owns all information and other materials related to a person's employment as part of the employment relationship.

In accordance with privacy protection laws, all recipients must handle the Company's information with the utmost care to ensure confidentiality, thereby preventing the release of non-public data and information, and committing to safeguard the received information and avoid any improper or unauthorised use.

PROTECTION OF DIVERSITY

Molino Pasini S.P.A. Società Benefit protects the privacy of its employees in line with applicable legislation, committing not to disclose or share personal data without the individual's permission, unless required by law. The collection, processing, and storage of such information are carried out within established procedures designed to prevent unauthorised access. To prevent persons from becoming aware of it and to ensure that all privacy regulations are fully adhered to.

The employee must keep the confidentiality of any information learned during their duties, in accordance with applicable laws, regulations, and relevant circumstances. They must uphold this confidentiality obligation even after their employment ends, ensuring compliance with relevant privacy laws; additionally, they must carefully safeguard any documents entrusted to them.

CONFLICT OF INTEREST

All company staff must uphold autonomy and integrity to prevent decisions or actions that might even seemingly conflict with the company's operations.

Therefore, any activity or action that could interfere with the proper fulfilment of one's responsibilities or that might harm the interests and reputation of the Companies must be avoided.

All actual or potential conflicts of interest must be reported in advance to one's supervisor or a board member. When specified in the published document, a report can be submitted through the channels described in the whistleblowing procedure.

For example, and without limiting the scope, the following situations lead to a conflict of interest.

- Employees, their spouses, de facto partners, relatives (up to the second degree in the direct line and up to the fourth degree in the collateral line), or in-laws (up to the second degree) must disclose any economic or financial interests in third parties with whom the Company has legal relations, if such interests could influence their ability to make impartial decisions. For instance, an employee might hire a consultant who works for the Company for personal reasons and over whom the employee has decision-making authority; an employee might manage relations with a third-party supplier where they hold a financial interest or shares, or where a relative is an owner, partner, or has a senior role; or an employee might enter into personal contracts with a third-party supplier or consultant of the Company over whom they exercise decision-making authority.
- Exploitation of a person's official role or the knowledge gained during the performance of their duties to promote personal or third-party interests or otherwise acting against the interests of the Company.
- Carrying out work activities of any kind at clients, suppliers, competitors, debtors, creditors, and other third parties.
- Acceptance of money, favours, or benefits from individuals (whether natural persons or entities) who are or intend to engage in business relations with the Company.

USE OF COMPANY ASSETS AND IT SYSTEMS

All employees must use and safeguard the company assets allocated for their duties with due care. The unauthorised use of company property and resources is strictly prohibited. In accordance with applicable laws, necessary measures are implemented to prevent their misuse.

Regarding the use of IT systems, each employee agrees to follow the company's behavioural rules, shares responsibility for the security of the systems used, and complies with applicable regulatory requirements and license agreement conditions.

Aside from what is allowed under civil and criminal laws, it is considered inappropriate to use company assets and resources to access the web for non-work reasons or to send offensive or derogatory messages, as this could damage the Company's image and reputation.

Each employee is also expected to make the necessary effort to prevent potential crimes committed using IT resources.

GIFTS, GIVEAWAYS, BENEVOLENT OR CULTURAL ENDOWMENTS AND OTHER UTILITIES

No employee may request, on their own behalf or on behalf of others, gifts or other goods, nor accept them, except those of modest value and in accordance with standard commercial and courtesy practices, from anyone who has benefited, or may benefit, from the activities of Molino Pasini S.P.A. Società Benefit.

Similarly, no employee may give gifts or other items to any party from whom they might receive preferential treatment when carrying out any activity related to the Company.

Molino Pasini S.P.A. Società Benefit commits to engaging in initiatives with charitable or cultural contributions, including sponsorships, provided that they do not jeopardise the Company's profitability. Whenever possible, the Company strives to measure the positive impact it generates.

Every form of disbursement must be appropriately documented, monitored, approved by the Board of Directors, and included in the annual Impact Report.

PROTECTION OF THE HEALTH AND SAFETY OF WORKERS

Molino Pasini S.P.A. Società Benefit strictly adheres to the current laws on accident prevention and safety, as they pertain to the food industry and general workplace settings.

Every employee, depending on their level of responsibility and within their roles, must participate in risk prevention, environmental conservation at the workplace, and the safeguarding of their own health and safety, as well as that of colleagues and third parties, including specifically:

- Comply with current regulations, the Code of Conduct protocols, and procedures.
- Consistently ensure the accuracy of the information and documents.
- Avoid circumstances that might lead to conflicts of interest.
- Ensure compliance with all the directives of Legislative Decree no. 81/08 and subsequent amendments.
- Identify the responsible functions as outlined by Legislative Decree no. 81/08 and any later amendments and modifications.
- Refrain from any behaviour or encouraging behaviours that breach the principles of existing regulations on workplace safety and corporate procedures/protocols.

Compliance with all provisions of Legislative Decree No. 81/08 and subsequent amendments, as well as the accuracy and regular updating of the risk assessment, is systematically verified. This verification is carried out under the responsibility of the Employer and by specialists with the appropriate expertise, whether internal or external to the organisation.

ENVIRONMENTAL PROTECTION

Molino Pasini S.P.A. Società Benefit commits to operate fully in accordance with current legislation and to base its activities on principles and standards of environmental protection and respect, which can be embodied in the implementation of measures and procedures designed to:

- Adhere to all prescriptions and specific environmental legislation.
- Minimise the impact on the surrounding environment as much as possible, including both animal and plant species.
- Mitigate and limit to the extent possible the effects of water discharges.
- Ensure the organisation handles waste produced and treated in accordance with relevant regulations and authorisations, applying circular economy principles where possible.
- Prevent and avoid polluting the soil, subsoil, surface water, or groundwater.
- Raise awareness among stakeholders to guarantee that environmental protection remains a shared priority.

MANAGEMENT OF ADMINISTRATION AND FINANCES

Molino Pasini S.P.A. Società Benefit is committed to maintaining transparent accounting records, ensuring all data collected and recorded is truthful, accurate, and complete. All administrative management must be conducted to ensure the reliability of the administrative and accounting system and the precise reflection of the company's economic, asset, and financial situation in internal documents, financial statements, and other corporate communications, as well as in information provided to investors, the public, or authorities. Therefore, all employees must cooperate fully to ensure management data is recorded accurately and promptly in the accounts. Each accounting entry must be supported by appropriate justificatory documentation. In particular, expenses related to courtesy that affect the company's image must always be approved by the relevant function manager or, if necessary, by a board member, and must adhere to the principles previously outlined.

When dealing with consultants and collaborators, it is strictly prohibited to offer services to these individuals beyond what is specified in the contract or to approve payments for tasks that fall outside the agreed-upon scope. Such relationships must be managed in accordance with company protocols for appointing and overseeing consultancy assignments and external partnerships.

Employees who identify any omissions, falsifications, or oversights in the accounting records or related documentation should promptly inform their supervisor and/or a board member.

Modes of Execution and Supervision

The company's policy is to promote a culture at all levels that emphasises understanding individual and collective responsibilities and encourages a cooperative approach towards various control activities, all aimed at improving the efficiency of social operations.

Although it does not currently have an Organisational Model as per Legislative Decree 231/2001, the Company recognises the importance of such a tool in preventing offences and fostering a culture of responsibility, legality, and transparency. Pending the assessment of the feasibility of future adoption, the Board of Directors commits to providing effective oversight of the provisions in this Code of Conduct, including, where necessary, engaging third-party, independent, and qualified support for ethical auditing and consulting functions. The Company reserves the right to periodically review its organisational framework to ensure it remains compliant with legal changes, meets its operational needs, and supports its sustainability and social responsibility objectives.

In particular, the activities assigned to the Board of Directors involve carrying out the following tasks:

1. The regular review of adherence to and application of the Code of Conduct.
2. The performance of inquiries upon receipt of violation notifications.
3. The consultation and assessment regarding the adoption of sanctioning measures.
4. The dissemination of the Code of Conduct.
5. The suggested amendments and updates to the Code of Conduct.
6. If necessary, notify the other members of the Board of Directors about any activities.

Within the scope of these activities, the Board of Directors members are provided with the necessary resources, as identified by the staff as needed.

WHISTLEBLOWING

All employees must promptly and confidentially report any actual or suspected violation of the Code of Conduct they become aware of during their work to their functional manager, another area manager, or a member of the Board of Directors. Where applicable, employees are encouraged to report incidents in accordance with the guidelines outlined in the whistleblowing procedure, which is available on the company's website.

All line managers must oversee their subordinates' work and inform one or more members of the Board of Directors of any potential breaches of the provisions contained in the Code of Conduct.

REGULATORY SYSTEM

A severe or ongoing breach of the standards in the Code of Conduct by its recipients damages the trust established between the Company and its recipients. It can lead to disciplinary actions, including compensation for damages, and in cases of serious breaches, the termination of the employment contract. For employees, complying with the Code of Conduct is a crucial part of their contractual obligations, as outlined in Articles 2104, 2105, and 2106 of the Civil Code. The disciplinary framework should be consistent with the requirements of Law No. 300 of 20 May 1970, relevant sector-specific regulations where applicable, collective bargaining agreements, and the organisation's internal disciplinary procedures.

If a breach of this Code of Conduct occurs involving one or more Directors, it must be promptly reported to the Board of Directors, which will take the necessary actions.

Other conduct by third parties that breaches the principles set out by this Code of Conduct may, ultimately, be punishable by the dissolution of the contract, in accordance with article 1453 of the Civil Code, and potentially with a claim for damages incurred.

Final Provisions

The Board of Directors approves this Code of Conduct, which takes effect on the day it is published on the company's website.

Molino Pasini S.P.A. Società Benefit intends to review any potential amendments or updates to the Code of Ethics at least every three years, as approved by the Board of Directors.

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REVISION MATRIX

REVISION	DATE	DRAFTING	THE MAXIMUM LOAD CONDITIONS MUST NOT BE EXCEEDED UNDER ANY CIRCUMSTANCES.
00	19/08/2025	B Team	First issue
01	31/10/2025	B Team	Shareholders' Meeting Approval

